

Simon Franzini (Cal. Bar No. 287631)  
simon@dovel.com  
Martin Brenner (Cal Bar No. 333540)  
martin@dovel.com  
Grace Bennett (Cal. Bar No. 345948)  
grace@dovel.com  
DOVEL & LUNER, LLP  
201 Santa Monica Blvd., Suite 600  
Santa Monica, California 90401  
Telephone: (310) 656-7066  
Facsimile: (310) 656-7069

*Attorneys for Plaintiffs*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

SHARON CROWDER, JOEL LUMIAN,  
ROBERT SMITH, AMANDA  
GOLDWASSER, and MARK ELKINS  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

V.

THE SHADE STORE, LLC,

*Defendant.*

Case No. 5:23-cv-02331-NC

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
FILE (1) PLAINTIFFS' REPLY IN  
SUPPORT OF MOTION FOR CLASS  
CERTIFICATION; (2) PLAINTIFFS'  
OPPOSITION TO MOTION TO  
EXCLUDE THE TESTIMONY OF  
PLAINTIFFS' EXPERTS;  
(3) DEFENDANT'S REPLY IN SUPPORT  
OF MOTION TO EXCLUDE THE  
TESTIMONY OF PLAINTIFFS'  
EXPERTS; (4) CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE;  
(5) CONTINUANCE OF HEARING ON  
DEFENDANT'S MOTION TO EXCLUDE  
THE TESTIMONY OF PLAINTIFFS'  
EXPERTS**

1 Pursuant to Local Rule 6-2, Plaintiffs Sharon Crowder, Joel Lumian, Robert Smith, Amanda  
2 Goldwasser, and Mark Elkins (“Plaintiffs”) and Defendant The Shade Store, LLC (“Defendant,” and  
3 together with Plaintiffs, the “Parties”), by and through their respective counsel of record, stipulate as  
4 follows:

5 WHEREAS, on March 24, 2025, Plaintiffs filed their Notice of Motion and Motion for Class  
6 Certification (Dkt. 112);

7 WHEREAS, on March 25, 2025, the Court set the hearing on Plaintiffs’ Motion for Class  
8 Certification for June 11, 2025, at 11:00 a.m. (Dkt. 114);

9 WHEREAS, the Court also scheduled a further Case Management Conference for June 11,  
10 2025, at 11:00 a.m. (Dkt. 114);

11 WHEREAS, on April 28, 2025, Defendant filed its Opposition to Plaintiffs’ Motion for Class  
12 Certification (Dkt. 121) and its Motion to Exclude the Testimony of Plaintiffs’ Experts (Dkt. 120)  
13 (“Motion to Exclude”), which Defendant noticed for hearing on June 11, 2025, at 11:00 a.m.;

14 WHEREAS, on May 23, 2025, the Court granted the Parties’ Stipulation and Proposed Order  
15 to extend the Parties’ time to file (1) Plaintiffs’ Reply in Support of Motion for Class Certification;  
16 (2) Plaintiffs’ Opposition to Defendant’s Motion to Exclude; (3) Defendant’s Reply in Support of its  
17 Motion to Exclude (Dkt. 141);

18 WHEREAS, on May 27, 2025, the Court granted the Parties’ Stipulation and Proposed Order  
19 for Continuance of (1) Case Management Conference; and (2) the hearing on Defendant’s Motion to  
20 Exclude the Testimony of Plaintiffs’ Experts (Dkt. 143);

21 WHEREAS, on June 11, 2025, the Court granted the Parties’ Stipulation and Proposed Order  
22 for Extension of Time to File (1) Plaintiffs’ Reply in Support of Motion for Class Certification; (2)  
23 Plaintiffs’ Opposition to Motion to Exclude the Testimony of Plaintiffs’ Experts; (3) Defendant’s  
24 Reply in Support of Motion to Exclude the Testimony of Plaintiffs’ Experts; (4) Continuance of Case  
25 Management Conference; and (5) Continuance of Hearing on Defendant’s Motion to Exclude the  
26 Testimony of Plaintiffs’ Experts (Dkt. 145);

27 WHEREAS, the existing deadlines and scheduled hearings are as follows:  
28

- 1        • July 17, 2025 – Plaintiffs’ Reply in Support of Motion for Class Certification and
- 2              Plaintiffs’ Opposition to Motion to Exclude;
- 3        • August 20, 2025 – Defendant’s Reply in Support of its Motion to Exclude;
- 4        • September 10, at 11:00 a.m. – Hearing on Plaintiffs’ Motion for Class
- 5              Certification, Hearing on Defendant’s Motion to Exclude, Case Management
- 6              Conference;

7              WHEREAS, the Parties respectfully request a 30-day extension of these deadlines. The  
 8        Parties request this extension because more time is needed to adequately brief Plaintiffs’ Motion for  
 9        Class Certification and Defendant’s Motion to Exclude due to other obligations, especially including  
 10      the care of Plaintiffs’ counsel’s newborn child. In addition, the Parties have been discussing  
 11      settlement and the extension will provide the Parties time to focus on a mutually agreeable resolution  
 12      to the case.

13              WHEREAS, this is the Parties’ third request to extend or continue these deadlines;

14              WHEREAS, the extension will not otherwise alter the date of any event or any deadline  
 15      already fixed by Court order;

16              THE PARTIES STIPULATE AND REQUEST as follows:

- 17        1. Plaintiffs’ Reply in Support of Motion for Class Certification and Opposition to  
             Motion to Exclude shall be filed by August 15, 2025.
- 18        2. Defendant’s Reply in Support of its Motion to Exclude the Testimony of Plaintiffs’  
             Experts shall be filed by September 19, 2025.
- 19        3. The hearing on Plaintiffs’ Motion for Class Certification, hearing on Defendant’s  
             Motion to Exclude, and Case Management Conference shall be continued to October  
             8, 2025, at 11:00 a.m.

24  
 25 Dated: July 7, 2025

Respectfully submitted,

26              By: /s/ Martin Brenner

27              Simon Franzini (Cal. Bar No. 287631)

28              simon@dovel.com

Grace Bennett (Cal. Bar No. 345948)

grace@dovel.com

Martin Brenner (Cal Bar No. 333540)  
martin@dovel.com  
DOVEL & LUNER, LLP  
201 Santa Monica Blvd., Suite 600  
Santa Monica, California 90401  
Telephone: (310) 656-7066  
Facsimile: (310) 656-7069

*Attorneys for Plaintiffs*

Dated: July 7, 2025

Respectfully submitted,

By: /s/ Shlomo Fellig  
Steven N. Feldman (Bar No. 281405)  
*steve.feldman@lw.com*  
355 South Grand Avenue, Suite 100  
Los Angeles, California 90071  
Telephone: +1.213.485.1234

Johanna Spellman (pro hac vice)  
*johanna.spellman@lw.com*  
Kevin Jakopchek (pro hac vice)  
*kevin.jakopchek@lw.com*  
330 N. Wabash Avenue, Suite 2800  
Chicago, IL 60611  
Telephone: +1.312.876.7700

Shlomo Fellig (pro hac vice)  
*shlomo.fellig@lw.com*  
200 Clarendon Street  
Boston, MA 02116  
Telephone: +1.617.948.6000

*Attorneys for Defendant  
The Shade Store, LLC*

## **ATTESTATION OF COMPLIANCE**

In compliance with Civil Local Rule 5-1(i)(3), I attest that all other counsel on whose behalf this filing is jointly submitted have approved of and concurred in this filing.

/s/ Martin Brenner  
Martin Brenner

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
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3  
4 Dated: \_\_\_\_\_  
5 Hon. Nathanael M. Cousins  
6 UNITED STATES MAGISTRATE JUDGE  
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